



# **United Nations University**

## Policy on Prohibited Conduct

Adopted by the UNU Council at its 72<sup>nd</sup> session in December 2019 in Tokyo, Japan. This Policy supersedes the UNU Policy on Prohibited Conduct adopted by the UNU Council at its 71<sup>st</sup> session in May 2019 in Rome, Italy.

## I. Definitions

1. **Discrimination** is any unfair treatment or arbitrary distinction based on a person's race, sex, religion, nationality, ethnic origin, sexual orientation, disability, age, language, social origin or other similar shared characteristic or trait. Discrimination may be an isolated event affecting one person or a group of persons similarly situated, or it may manifest itself through Harassment or Abuse of Authority.
2. **Harassment** is any improper and unwelcome conduct that might reasonably be expected or be perceived to cause offence or humiliation to another person. Harassment may take the form of words, gestures or actions which tend to annoy, alarm, abuse, demean, intimidate, belittle, humiliate or embarrass another or which create an intimidating, hostile or offensive work environment. Harassment normally implies a series of incidents. Disagreement on work performance or on other work-related issues is normally not considered Harassment and is not dealt with under the provisions of this policy but in the context of performance management.
3. **Sexual Harassment** is any unwelcome conduct of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment. Sexual Harassment may occur in the workplace or in connection with work. While typically involving a pattern of conduct, Sexual Harassment may take the form of a single incident. In assessing the reasonableness of expectations or perceptions, the perspective of the person who is the target of the conduct shall be considered.
4. **Abuse of Authority** is the improper use of a position of influence, power or authority against another person. This is particularly serious when a person uses his or her influence, power or authority to improperly influence the career or employment conditions of another, including, but not limited to, appointment, assignment, contract renewal, performance evaluation or promotion. Abuse of Authority may also include conduct that creates a hostile or offensive work environment which includes, but is not limited to, the use of intimidation, threats, blackmail or coercion. Discrimination and Harassment, including Sexual Harassment, are particularly serious when accompanied by Abuse of Authority.
5. **Prohibited Conduct** means Discrimination, Harassment, including Sexual Harassment, and Abuse of Authority.
6. **Staff Members** means UNU academic and administrative personnel as respectively defined in Sections 2.1.A.2 and 2.1.B.2 of the UNU Personnel Policy. Such personnel are officials of the United Nations and are covered by the Staff Regulations and Rules of the United Nations.
7. **Non-Staff Members** means UNU academic and administrative personnel as respectively defined in Sections 2.1.A.3, 2.1.B.3, and 2.1.C of the UNU Personnel Policy, such as Personnel Service Agreement holders (PSA), and Consultants and Individual Contractors (CTC/CIC), including individuals engaged by the UNU under different contractual modalities such as fellows, trainees, interns and gratis personnel. Such personnel are not officials of the United Nations and are not covered by the Staff Regulations and Rules of the United Nations.

8. **UNU Personnel** means Staff Members and Non-Staff Members.<sup>1</sup>
9. **Affected Individual** means the person or persons in the workplace or in connection with work towards whom the possible Prohibited Conduct is directed.
10. **Offender/Alleged Offender** means the person or persons in the workplace or in connection with work whose conduct constitutes Prohibited Conduct, if established under this Policy, or possible Prohibited Conduct.
11. **Impacted Individuals** may include the Affected Individual as well as witnesses and persons who intervene in a situation involving possible Prohibited Conduct.
12. **Report** refers to formal and/or informal reporting unless otherwise specified.
13. **Institute Director** means the director of a UNU institute, programme or operating unit established in accordance with UNU's regulatory framework.
14. **Office Head** means the person responsible for a unit, department, section or office other than an institute, programme or operating unit, established in accordance with UNU's regulatory framework.
15. **Managers and/or Supervisors** means Staff Members with substantial management and supervisory obligations.
16. **Retaliation** means any direct or indirect detrimental action that adversely affects the employment or working conditions of an individual, where such action has been recommended, threatened or taken for the purpose of punishing, intimidating or injuring an individual because that individual engaged in reporting misconduct or in cooperating with duly authorised audits or investigations.<sup>2</sup>

## II. General principles

17. In accordance with the provisions of Article VIII paragraph 1 of the UNU Charter, Article VIII paragraphs 8.7 and 8.8 of the Personnel Policy of the UNU, and the core values set out in UN Staff Regulation 1.2 (a) and UN Staff Rule 1.2 (f), every UNU Personnel has the right to be treated with dignity and respect, and to work in an environment free from Discrimination, Harassment and abuse.
18. UNU has an obligation to take all appropriate steps to prevent and respond to cases of Prohibited Conduct in UNU's workplace. All forms and expressions of such conduct are prohibited at UNU, regardless of national criminal or other provisions where any behaviour or actions occur.
19. Sexual Harassment, like sexual abuse and sexual violence, is rooted in historic power imbalances and the male-dominated culture that permeates governments, the private sector, international organizations and civil society. Sexual Harassment results from a culture of Discrimination and privilege, based on unequal gender

---

<sup>1</sup> Students of UNU Postgraduate Programmes are not officials of the United Nations and are not covered by the Staff Regulations and Rules of the United Nations (i.e., they are not Staff Members under this Policy). Nor are they considered Non-Staff Members under this Policy. UNU Students who wish to report cases of Prohibited Conduct are subject to the complaint procedure set forth in the rules governing their Postgraduate Programmes.

<sup>2</sup> This definition is based on the United Nations Secretary-General's bulletin ST/SGB/2017/2/Rev/1 on protection against Retaliation for reporting misconduct and for cooperating with duly authorized audits or investigations.

relations and power dynamics. It creates hostile workplaces, which limit the Affected Individual's ability to thrive. Sexual Harassment as well as other forms of Prohibited Conduct have no place at UNU.

20. Power imbalances based on gender, workplace or educational status, racial or ethnic backgrounds, age, disability, sexual orientation or economic class could impact on Prohibited Conduct and violate the human right of equality.
21. Power and seniority will not confer impunity. Staff Members who engage in Prohibited Conduct will be subject to proportionate disciplinary measures, up to and including dismissal; Non-Staff Members shall be subject to action in accordance with the terms and conditions of the contract governing their employment at UNU.
22. Reports of Prohibited Conduct in the workplace or in connection with work may be made by any person and against any person irrespective of whether such persons have any contractual status with UNU.
23. Offenders and Affected Individuals can be of any gender.
24. This Policy reflects a UN-wide common approach to supporting those who report or witness events of Prohibited Conduct and to ensure accountability of those who perpetrate it. UNU's goal in this Policy is to strengthen victim-centred efforts and foster safe, equal and inclusive working environments. This Policy will support efforts to create a workplace that is free of Prohibited Conduct.

### III. Early intervention and receipt and handling of informal reports of Prohibited Conduct

#### Early direct action

25. Affected Individuals may on a voluntary basis, if they feel comfortable and safe doing so, approach Alleged Offenders about inappropriate behaviour or instances of possible Prohibited Conduct and ask for such behaviour or instances to stop as the Alleged Offenders may not be aware of the negative impact of their behaviour on others. However, disparity in power or status, fear of Retaliation or the nature of the behaviour and/or instances of possible Prohibited Conduct may make direct confrontation difficult, and there is, therefore, no requirement for such action to be taken.

#### Confidential advice

26. Affected Individuals who believe they may have been subject to instances of possible Prohibited Conduct may raise this with their Institute Directors, Office Heads, Managers or Supervisors, if the situation allows and they feel comfortable doing so. Any such personnel approached by an Affected Individual shall inform that person, in a timely, sensitive and impartial manner, that confidential advice, assistance and information about the options available under this Policy may be obtained from the Office of the Ombudsman or the Office of the Staff Counsellor.<sup>3</sup> Institute Directors, Office Heads, Managers and Supervisors can consult the Office of the Ombudsman for guidance.

---

<sup>3</sup> The Office of the Ombudsman and the Office of the Staff Counsellor have the obligation to maintain **strict confidentiality** concerning all matters that are brought to their attention and take every reasonable step to **safeguard confidentiality and privileged information**. They shall not reveal the identity of any individual with whom there is contact in the course of case-related work, nor shall they reveal information provided in confidence that could lead to the identification of the individual, **without the individual's express permission**.

27. UNU Personnel may also obtain confidential information or clarifications on this Policy from the UNU Chief of Human Resources.

#### **IV. Managerial Intervention**

28. If Institute Directors, Office Heads, Managers and Supervisors are approached by Affected Individuals or become aware of instances of possible Prohibited Conduct, they shall address the situation in a timely, sensitive, fair and impartial manner. Their intervention may require reporting the issue to other senior personnel of UNU so as to ensure that the incident is dealt with in compliance with this Policy.
29. If Institute Directors, Office Heads, Managers or Supervisors cannot perform this role for any reason, they shall, in consultation with the UNU Chief of Human Resources, refer the Affected Individual to another senior UNU Personnel.
30. Institute Directors, Office Heads, Managers or Supervisors who become aware of an incident shall keep a written record of the matter, noting dates, places, a description of what happened, and the names of any witnesses and of anyone who may have information concerning the incident or situation at issue, and must treat the situation with sensitivity and confidentiality to the greatest extent possible.
31. A committee composed of the Executive Officer, Chief of Staff, Legal Adviser, Director of Administration, and Chief of Human Resources <sup>4</sup>shall be established in order to advise the Rector on the interpretation and implementation of this Policy and on any measures required to appropriately address allegations of possible Prohibited Conduct. The committee shall also advise the Responsible Official as defined in paragraph 41 below.

#### **V. Informal resolution**

32. Affected Individuals may, on a voluntary basis, wish to deal with an event of possible Prohibited Conduct in an informal manner.
33. Affected Individuals are encouraged to ask for assistance from the Office of the Ombudsman in seeking informal resolution.
34. With the consent of the Affected Individual, the Office of the Ombudsman may meet informally with the Alleged Offender to provide information about the situation and discuss the manner in which it might be resolved.
35. An unsuccessful attempt to resolve the matter informally does not preclude it from being formally reported.

---

<sup>4</sup> If a member of the committee is accused of Prohibited Conduct or in the case of a conflict of interest or perceived conflict of interest, such member must recuse him/herself or he/she must be disqualified from taking part in any of the activities of the committee.

## VI. Formal resolution

### Receipt and handling of formal reports of Prohibited Conduct

36. Formal reports of possible Prohibited Conduct may be made by persons who consider that they were the Affected Individuals or by persons who have direct knowledge of possible Prohibited Conduct or by any third-party with relevant knowledge of possible Prohibited Conduct.
37. Formal reports of Sexual Harassment are not subject to deadlines. Formal reports of Discrimination, Harassment and Abuse of Authority must be submitted within one year from the date of the last incident.
38. Formal reports of Prohibited Conduct may be made anonymously. The anonymity and an untimely submission of reports may make more difficult an investigation, disciplinary proceedings or remedial actions. In such cases, it will be for the personnel indicated in paragraph 42 at each stage of the process to determine whether there is a sufficient basis to move forward.
39. A formal report of Prohibited Conduct shall, to the extent possible, describe specific incident(s) of possible Prohibited Conduct or a pattern of possible Prohibited Conduct. The formal report should include as much detail as possible. The report shall, at least, include the following:
  - Name of the Alleged Offender;
  - Name of alleged Affected Individual, if the report is made by a third party;
  - Date(s) and location(s) of incident(s);
  - Description of incident(s)/patterns;
  - Names of witnesses, if any;
  - Any other relevant information, including documentary evidence, if available;
  - Date of the submission of the report and name of person making the report, unless the report is made anonymously.
40. If the person making the report chooses to report on an anonymous basis, the reporter must provide sufficient information concerning the basis of the allegations and sufficient detail or supporting factual basis that the matter can be pursued responsibly. Otherwise, the matter will not be pursued further.
41. A formal report shall be submitted to the Institute Director or Office Head where the incident has taken place (hereinafter "Responsible Official").
42. Upon receipt of a formal report, the Responsible Official will provide a copy of the report to the Director of Administration and the Rector within five working days. The report will be promptly reviewed by the Responsible Official, the Director of Administration, and the Rector in order to assess whether it provides sufficient information, details and supporting factual basis so as to ascertain whether there are sufficient grounds to warrant a formal investigation.
43. The Rector will decide whether an investigation is warranted taking into account the views of the Responsible Official and Director of Administration. If an investigation is warranted, the Director of Administration will refer the report to the Office of Internal Oversight Services of the United Nations ("OIOS") within twenty working days from the receipt of the report.

44. In cases where the formal report of possible Prohibited Conduct is submitted by a person other than the Affected Individual, OIOS should consider the views of the Affected Individual and the evidence available before deciding on whether to proceed with an investigation.
45. UNU is committed to ensuring that allegations of Prohibited Conduct are investigated in an impartial, thorough and timely manner. To this end, UNU will cooperate with OIOS during all phases of the investigation so as to ensure that any conflicts of interest are appropriately addressed, the investigation is conducted with fairness to all parties concerned, and their rights are fully protected. Investigations are conducted in line with this Policy and the procedures established by OIOS, as appropriate.
46. OIOS shall acknowledge any formal report of possible Prohibited Conduct transmitted by UNU without delay.
47. The Affected Individual shall be informed as appropriate of the status of any investigation and outcome of the report. The Alleged Offender will also be informed of the outcome of the report. The provision of any such information shall respect the regulations and rules on confidentiality as applicable to the Alleged Offender and to the Affected Individual.
48. On the basis of the report, the Responsible Official, in consultation with the Director of Administration and the Rector, shall promptly take one of the following courses of action:
  - a) If the report indicates that no Prohibited Conduct took place, the Responsible Official will close the case and so inform the Alleged Offender and the Affected Individual, giving a summary of the findings and conclusions of the investigation;
  - b) If the report indicates that there was a factual basis for the allegations but that, while not sufficient to justify the institution of disciplinary proceedings or remedial action, the facts would warrant managerial action, the Responsible Official, in consultation with the Director of Administration and the Rector, shall decide on the type of managerial action to be taken, and make arrangements for the implementation of any follow-up measures that may be necessary. Managerial action may include mandatory training, reprimand, a change of functions or responsibilities, counselling or other appropriate corrective measures. The Responsible Official shall inform the individuals concerned of the outcome of the investigation and the action taken;
  - c) If the report indicates that the allegations were well-founded and that the conduct in question amounts to Prohibited Conduct, the Rector, in consultation with the Responsible Official and the Director of Administration, will:
    - i. If the Offender is a Staff Member, initiate disciplinary proceedings pursuant to Article X of the UNU Personnel Policy and will inform the individuals concerned of the outcome of the investigation and of the action taken;
    - ii. If the Offender is a Non-Staff Member, recommend appropriate remedial action in accordance with the terms of the contract or agreement governing the relationship between the Offender and UNU, and will inform the individual concerned of the outcome of the investigation and of the action taken.

49. Should the report indicate that the allegations of Prohibited Conduct were unfounded and based on malicious intent, the Rector, in consultation with the Responsible Official and the Director of Administration, will follow the following procedures:
- a) If the person who made the report is a Staff Member, decide whether disciplinary proceedings or other appropriate action should be initiated against such person;
  - b) If the person who made the report is a Non-Staff Member, decide whether remedial action should be taken in accordance with the terms of the contract or agreement governing the relationship between such person and UNU.
50. If, following an investigation, UNU concludes that there are credible allegations of possible criminal conduct, UNU shall consider referral of the allegations to national authorities in accordance with UNU's established procedures. UNU recognizes that the Affected Individual can always choose to report possible criminal conduct directly to national authorities.
51. If the Responsible Official receives a report in which the Rector is accused of Prohibited Conduct, paragraphs 42-49 shall not apply. In this event, the Responsible Official shall transmit the report to the Assistant-Secretary-General for Human Resources Management of the United Nations within five working days, who will handle the matter in accordance with the applicable UN regulations and rules.
52. If the Responsible Official is the Alleged Offender, the formal report will be submitted to the Director of Administration, who will carry out the relevant functions of the Responsible Official indicated in this Section. In this case, the Rector will designate a senior Staff Member who will carry out the relevant functions of the Director of Administration indicated in this Section.
53. If the Responsible Official receives a formal report in which the Director of Administration is accused of possible Prohibited Conduct, the Rector will designate a senior Staff Member who will carry out the relevant functions of the Director of Administration indicated in this Section.
54. Where the Affected Individual or Alleged Offender has grounds to believe that the procedure followed in respect of the allegations of Prohibited Conduct was improper, he/she may appeal pursuant to Article XI of the UNU Personnel Policy in the case of Staff Members, or pursuant to the terms of the contract or agreement governing the relationship between such person and UNU in the case of Non-Staff Members.

## **VII. Prevention**

### **Obligations of UNU**

55. UNU will:
- a) Take appropriate measures to promote a harmonious working environment;
  - b) Protect UNU Personnel from Prohibited Conduct through preventive measures;



- c) Screen candidates to UNU's vacancy announcements using the 'United Nations Clear Check Database' during recruitment processes;
- d) Undertake diligent reference checks of candidates during recruitment processes to ensure that individuals who have a documented history of Prohibited Conduct, including Sexual Harassment, are not hired;
- e) Request that contractors, suppliers, partners adhere to a zero-tolerance approach for Sexual Harassment and commit to taking adequate action if faced with Sexual Harassment allegations, in the absence of which, the relevant contractual arrangements can be terminated;
- f) Disseminate relevant training opportunities for Managers, Supervisors and personnel designated to provide support on Sexual Harassment under this Policy, building the skills necessary to effectively communicate with Affected Individuals of Sexual Harassment and to respond appropriately;
- g) Disseminate, preferably, in-person training, awareness-raising and skill-building for UNU Personnel at large on diversity, respect, equality and bystander techniques for intervening in situations of Sexual Harassment; and,
- h) Ensure that information on this Policy and resources on issues relating to Prohibited Conduct are accessible to all UNU Personnel through web platforms, targeted communications and initiatives.

#### **Obligations of Institute Directors, Office Heads, Managers and Supervisors**

56. Institute Directors, Office Heads, Managers and Supervisors shall, in addition to their obligations as Staff Members:
- a) Demonstrate their commitment to the prevention of, and response to, cases of Prohibited Conduct, educate themselves about issues relating to such conduct, act as role models by maintaining a high standard of personal conduct with consciousness of the power their position holds, and treat all colleagues with courtesy and respect;
  - b) Respond promptly to complaints, take them seriously and ensure that the necessary actions for which they are responsible are taken with respect for the Affected Individual;
  - c) Maintain open dialogue within their units to promote a harmonious working environment and address inappropriate behaviours and conduct that may be in violation of this Policy;
  - d) Monitor their work units for conduct that may be in violation of this Policy and endeavour to promote a harmonious working environment;
  - e) Ensure that relevant UNU Personnel acknowledge receipt and awareness of this Policy; and,

- f) Endeavour to create an atmosphere in which UNU Personnel feel free to express concerns about inappropriate behaviours and encourage them to use, without fear of reprisal, the informal and formal mechanisms and all services and recourse mechanisms available to them through UNU and the dedicated UN offices.

57. Failure on the part of Institute Directors, Office Heads, Managers and Supervisors to fulfil their obligations under this Policy may be considered a breach of duty, which, if established, shall be reflected in their annual performance appraisal, and they will be subject to administrative or disciplinary action, as appropriate.

### **Obligations of UNU Personnel**

58. UNU Personnel shall:

- a) Undertake mandatory training, including during the induction or the onboarding process to set the behavioural expectations, and familiarize themselves with this Policy, including ST/SGB/2017/2/Rev.1 on protection against Retaliation;
- b) Attend other training opportunities related to Prohibited Conduct, including trainings about the very specific harassment threats that trans and gender non-conforming individuals can face, made available by UNU to the extent possible;
- c) Demonstrate commitment to zero-tolerance for Prohibited Conduct and treat all people in the workplace with courtesy and respect with an awareness of their own behaviour and how it may be perceived and/or received by others;
- d) Refrain from encouraging other UNU Personnel to engage in Prohibited Conduct, including sexually harassing or abusive behaviour;
- e) Take action where appropriate and possible when an act of possible Prohibited Conduct is witnessed;
- f) Cooperate with investigations, audits and reviews; and,
- g) Adhere to their obligations under this Policy which shall be reflected in workplans and performance evaluations.

### **Guidance and Support for Affected Individuals**

59. Guidance for Affected Individuals and Impacted Individuals may be required at different stages, including:

- Before making a complaint regarding options to address the matter;
- During any formal or informal process;
- At and following the conclusion of any formal or informal process or investigation;
- Managing confidentiality requirements.

60. Confidential guidance and support are available for Affected Individuals and Impacted Individuals through the Office of the Ombudsman and the Office of the Staff Counsellor, as applicable.
61. The following types of guidance are available to UNU Personnel, including Impacted Individuals:
  - Information on informal and formal reporting options;
  - Information on hotlines/helplines;
  - Information on services provided by the Office of the Ombudsman.
62. The guidance and support listed in this paragraph shall remain available for the duration of the appointment of the Affected Individual or the Impacted Individual.

### **Right to be accompanied by a support person**

63. The Affected Individual has the right to be accompanied by another UNU Personnel or other third party during the formal or informal process. Support may not extend to legal representation or legal advocacy.
64. The accompanying person should be chosen by the Affected Individual. This could include a colleague, a family member or friend.
65. UNU may provide reasonable objection, during any stage of the formal or informal process, to a particular individual being present if it has reason to believe that their presence would jeopardize the process. In such cases, the Affected Individual may choose an alternative individual to accompany them.
66. The accompanying person should fully familiarize themselves with this Policy. They should always act in the best interests of the Affected Individual.
67. The accompanying person shall immediately disclose any conflict of interest. The fact that the accompanying person is a witness (direct or corroborative) to the incident of Prohibited Conduct would amount to a conflict of interest.
68. The accompanying person should keep information relating to, or arising out of, the allegation of Prohibited Conduct strictly confidential except as may be appropriately disclosed during an investigation or in compliance with any required disclosure to ethics or medical offices.

### **Work performance**

69. At the point when an Institute Director, Office Head, Manager or Supervisor become aware that a person is the subject of an event of possible Prohibited Conduct, they have an obligation to check if the Affected Individual's work performance has been impacted. They will work in collaboration with the Affected Individual so as to properly address the issue being mindful of the applicable circumstances in the preparation of performance reviews but subject to the need to take management actions, where appropriate.

70. Measures which may be considered appropriate to respond to Affected Individuals' work-related performance issues may include new work plan, leave and/or other working arrangements. In such circumstances, due regard to confidentiality must be given, as appropriate.

### **Interim measures**

71. Interim measures may be required to provide support to the Affected Individual to ensure the integrity of the investigation and any evidence and/or to prevent the occurrence/repetition of Prohibited Conduct. Interim measures may also be necessary to protect the interests of UNU, including the effective functioning of its institutes and offices. Such measures may include:
- Separation of the Alleged Offender from the Affected Individual;
  - Reassignment of either the Alleged Offender or Affected Individual with the consent of the individual concerned;
  - Special leave for either the Alleged Offender or Affected Individual;
  - Administrative leave for the Alleged Offender;
  - Temporary changes of reporting lines;
  - Any other appropriate measure or a combination of measures to the extent consistent with this Policy and any applicable regulations, rules, policies, and administrative issuances.

### **Post-investigation monitoring**

72. Once an investigation has been completed and a decision has been taken on its outcome, appropriate measures shall be taken by Institute Directors or Office Heads to monitor the situation. These measures may include, but are not limited to, the following:
- Monitoring the status of the Affected Individual, the Offender/Alleged Offender – as the case may be – and the work unit(s) concerned at regular intervals in order to ensure that no party is subjected to Retaliation as a consequence of the investigation, its findings or outcome. Where Retaliation is detected, the Ethics Office shall promptly be notified, with the consent of the individual concerned, and the matter shall be handled in accordance with the provisions of ST/SGB/2017/2/Rev.1 on protection against Retaliation. In such cases, Institute Directors, Office Heads, Managers and Supervisors shall give proper attention to performance evaluations of the individuals concerned;
  - Ensuring that any administrative or disciplinary measures, or remedial actions taken as a result of the investigation have been duly implemented.

### **Protection against Retaliation**

73. Protection against Retaliation available to a person reporting possible cases of Prohibited Conduct shall be in accordance with the provisions of ST/SGB/2017/2/Rev.1 on protection against Retaliation irrespective of the outcome of the report of Prohibited Conduct.
74. Anyone reporting possible cases of Prohibited Conduct shall be informed about his/her rights under ST/SGB/2017/2/Rev.1 on protection against Retaliation.

75. OIOS will inform the Ethics Office of any report of Prohibited Conduct received that it identifies as posing a Retaliation risk with the consent of the person who made the report.
76. Any form of Retaliation may entail disciplinary measures or remedial actions, as appropriate.

### **Data collection**

77. The modalities of the entry of the information described in Section 8.9 of the UNU Personnel Policy into, and the administration of and access to, the confidential 'United Nations Clear Check Database' shall be in accordance with procedures to be established by the Rector on the basis of guidelines issued by the Secretariat of the United Nations.
78. Anonymized data and information of cases of Sexual Harassment for internal monitoring and analysis, and reporting to the competent offices of the Secretariat of the United Nations, as required, shall be maintained within the UNU Human Resources Unit.

### **Implementation**

79. The Rector is accountable for ensuring implementation of this Policy on an ongoing basis, including by working with key stakeholders.
80. Institute Directors and Office Heads shall be responsible for the implementation of this Policy in their respective institutes and offices.
81. Failure to adhere to this Policy by any UNU Personnel constitutes possible misconduct subject to proportionate disciplinary measures; Non-Staff Members shall be subject to remedial action in accordance with the terms of the contract or agreement governing their relationship with UNU.
82. The Rector will provide an annual report on cases of Sexual Harassment to the Chair of the UNU Council and the Secretary-General of the United Nations.
83. This Policy will be reviewed periodically as needed, but at least every three (3) years, taking into account monitoring results and any changes in related policies and the organisational structure of UNU.